

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT MINNESOTA**

John Doe,

Civil Action No. 16-cv-1127 (ADM/KMM)

Plaintiff,

v.

DECLARATION OF MAREN F. GRIER

University of St. Thomas, Minnesota,

Defendant.

I Maren F. Grier, hereby declare the following:

1. I am an attorney in the law firm of Briggs and Morgan, P.A., which represents Defendant University of St. Thomas (“UST”) in this matter.
2. I make this declaration upon my personal knowledge.
3. Attached hereto as Exhibit 1 is a true and correct copy of UST’s Responses to Plaintiff’s First Requests for Production of Documents.
4. Attached hereto as Exhibit 2 is a true and correct copy of an October 2, 2017 letter from Beau McGraw to David Schooler.
5. Attached hereto as Exhibit 3 is a true and correct copy of an October 4, 2017 letter from me to Beau McGraw.
6. Attached hereto as Exhibit 4 is a true and correct copy of an October 24, 2017 email from Melissa Schultz to me.

7. Attached hereto as Exhibit 5 is a true and correct copy of UST's November 20, 2017 Supplemental Responses to Plaintiff's First Interrogatories. This supplemental response was not used by Plaintiff's counsel during the depositions of UST employees.

8. Attached hereto as Exhibit 6 is a true and correct copy of a document titled Sexual Misconduct Policy Appeal Process which was produced by UST in this litigation and Bates-labeled UST0003406-3441.

9. Attached hereto as Exhibit 7 is a true and correct copy of a March 12, 2018 email from me to Beau McGraw.

10. In the course of communications regarding Plaintiff's discovery requests and UST's objections, Plaintiff's counsel never offered to narrow the scope of Request No. 13 in Plaintiff's First Requests for Production of Documents.

11. On March 7, 2018, I participated in a meet and confer telephone call with Plaintiff's counsel, Beau McGraw. On that call, I inquired into whether, as a compromise, Plaintiff would be open to UST providing general information included on a spreadsheet of sexual misconduct cases maintained by the Title IX Coordinator without disclosing personal identifying information of non-party students. Counsel for Plaintiff stated that he believed that he was entitled to see the entire unredacted document and thus rejected this proposed potential compromise.

12. UST has produced 4,413 pages of documents in the course of this litigation. Plaintiff has produced 165 pages.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 11, 2018

s/Maren F. Grier

Maren F. Grier